

AMY JOSEPH PEDERSEN, OSB No. 853958
amy.joseph.pedersen@stoel.com
STOEL RIVES LLP
760 SW Ninth Avenue, Suite 300
Portland, OR 97205
Telephone: (503) 224-3380
Facsimile: (503) 220-2480

DANIEL PRINCE, Cal. SB# 237112 (*pro hac vice*)
danielprince@paulhastings.com
FELICIA A. DAVIS, Cal. SB# 266523 (*pro hac vice*)
feliciadavis@paulhastings.com
LAURA ZABELE, Cal. SB# 330847 (*pro hac vice*)
laurazabele@paulhastings.com
PAUL HASTINGS LLP
515 South Flower Street, 25th Floor
Los Angeles, CA 90071
Telephone: (213) 683-6000
Facsimile: (213) 627-0705

Attorneys for Defendant NIKE, INC.

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

KELLY CAHILL, SARA JOHNSTON,
LINDSAY ELIZABETH, and HEATHER
HENDER, individually and on behalf of
others similarly situated,

Plaintiffs,

v.

NIKE, INC., an Oregon Corporation,
Defendant.

Case No.: 3:18-cv-01477-JR

**DEFENDANT NIKE, INC.'S MOTION
TO UNSEAL MOTION TO EXCLUDE
THE OPINIONS OF PLAINTIFFS'
EXPERT, DAVID NEUMARK, PH.D.,
OPPOSITION TO PLAINTIFFS'
MOTION FOR CLASS
CERTIFICATION AND OBJECTIONS
TO EVIDENCE FILED IN SUPPORT OF
PLAINTIFFS' MOTION FOR CLASS
CERTIFICATION**

L.R. 7-1(a) CERTIFICATION

In compliance with Local Rule 7-1(a), Defendant Nike, Inc. (“Nike”) certifies that it has conferred on this Motion to Unseal with Plaintiffs’ counsel regarding the substance of this Motion. Plaintiffs do not oppose the Motion.

MOTION TO UNSEAL

Defendant Nike, Inc. (“Nike”) hereby submits this Motion to Unseal. On March 25, 2022, Nike filed its Motion to Exclude the Opinions of Plaintiffs’ Expert, David Neumark, Ph.D. (“Motion to Exclude”), Opposition to Plaintiffs’ Motion for Class Certification (“Opposition”) and Objections to Evidence Filed in Support of Plaintiffs’ Motion for Class Certification (“Objections”) under seal out of an abundance of caution. *See* ECF Nos. 181, 183 and 184. After reviewing the Motion to Exclude, Opposition and Objections, Nike has determined that they do not need to remain under seal. As such, Nike respectfully requests that the Court unseal Nike’s Motion to Exclude, Opposition and Objections.

Dated: April 4, 2022

Respectfully submitted,

/s/ Daniel Prince

Daniel Prince, Cal. SB# 237112 (*pro hac vice*)
danielprince@paulhastings.com
Felicia A. Davis, Cal. SB# 266523 (*pro hac vice*)
feliciadavis@paulhastings.com
Laura E. Zabele, Cal. SB# 330847 (*pro hac vice*)
laurazabele@paulhastings.com

PAUL HASTINGS LLP
515 South Flower Street, 25th Floor
Los Angeles, CA 90071-2228
Telephone: (213) 683-6000
Facsimile: (213) 627-0705

Amy Joseph Pedersen, OSB No. 853958
amy.joseph.pedersen@stoel.com
STOEL RIVES LLP
760 SW Ninth Avenue, Suite 3000
Portland, OR 97205
Telephone: (503) 294-9408
Facsimile: (503) 220-2480

Attorneys for Defendant NIKE, INC.